

86554RGH.txt

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1                                   TALIA BUMB  
2                           T A L I A B U M B ,  
3       having been called as a witness and duly sworn  
4       by the notary (Marlene Lee), was examined and  
5       testified as follows:  
6                           EXAMINATION BY MR. CAPOBIANCO:  
7           Q.     Could you please state your name  
8       for the record.  
9           A.     Talía Bumb.  
10          Q.     And have you ever had your  
11       deposition taken before?  
12          A.     No.  
13          Q.     Well, I'm sure your attorney has  
14       discussed the process with you, but let me just  
15       go through a couple of ground rules so that we  
16       can make sure we understand each other and that  
17       we can create a clear record.  
18                    The first ground rule is that we  
19       need to speak orally. So let's try to avoid  
20       any "uh-huhs," or "huh-uhs," or things that may  
21       not be clear on the record. If we slip into  
22       conversational-speak, I may ask, "Is that a  
23       yes? A no?" and ask for clarity.  
24          A.     Okay.  
25          Q.     The second thing, do you

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1                           TALIA BUMB  
2           Q.     Let me show you what was marked as  
3     Siegel Exhibit 4. I ask you if you've ever  
4     seen that document.  
5           A.     No, I've never seen this before.  
6           Q.     So you said you never noticed any  
7     of the postings on the wall in the downstairs  
8     office?  
9           A.     No.  
10          Q.     Could this have been on the wall in  
11     that office?  
12          A.     Not that I know of.  
13          Q.     I'm asking if it could have been.  
14          A.     I never saw it.  
15          Q.     Could it have been on the wall?  
16          A.     I don't know.  
17          Q.     Did you notice anything that was on  
18     the wall in that office?  
19          A.     Besides the schedule? No.  
20          Q.     Did you understand that you would  
21     be making 4.60 per hour, plus tips?  
22          A.     Approximately that, after I talked  
23     to the waitress.  
24          Q.     After you spoke to Anelise?  
25          A.     Yeah.

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1 TALIA BUMB  
2 Q. Which was during training?  
3 A. Yes.  
4 Q. Tell me about -- tell me what  
5 happened when you got to the club on that  
6 Sunday for training. What time did you get  
7 there?  
8 A. I don't remember what time I came  
9 in.  
10 Q. What happened once you got there?  
11 A. Once I got there, I met with  
12 Anelise.  
13 Q. Were you already in your uniform?  
14 A. No. I changed into my uniform when  
15 I got there.  
16 Q. Where did you get the uniform from?  
17 A. From Alberto.  
18 Q. When did Alberto give you the  
19 uniform?  
20 A. He gave it to me my first day of  
21 training.  
22 Q. On that Sunday?  
23 A. Yeah.  
24 Q. So did you first speak to Alberto  
25 on that Sunday? Or did you first speak to

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1 TALIA BUMB  
2 Anelise?  
3 A. I don't recall who I spoke with  
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4 first.

5 Q. But at some point Alberto gave you  
6 the uniform.

7 A. Yes.

8 Q. Did you have any conversation at  
9 the time he gave you the uniform?

10 A. He said it will be taken out of my  
11 check.

12 Q. He said that?

13 A. Yeah.

14 Q. Did you ever notice if it was taken  
15 out of your check?

16 A. I never -- I never looked at the --  
17 yeah. I never checked to see, I mean.

18 Q. Did he say how much would be taken  
19 out of your check?

20 A. He said it would be \$50 out of the  
21 first check and \$50 out of the second check.

22 Q. Did you ever have any response to  
23 that?

24 A. what do you mean? what do you mean  
25 by that?

□

35

1 TALIA BUMB

2 Q. When he told you that you'd have  
3 \$50 taken out of your first check and \$50 taken  
4 out of your second check for the uniform -- is  
5 that what HE told you?

6 A. Yes.

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10 Q. what did she tell you about how you  
11 should interact with the bartender?

12 A. what did she tell me about  
13 interacting with the bartender?

14 Q. Yes.

15 A. She was showing me, like, how to --  
16 the computer prints out our order, and how do I  
17 take the order to the bartender so that they  
18 can make the drinks.

19 Q. Okay. Anything else?

20 A. Not that I recall at this time.

21 Q. How long was your time there for  
22 training on that Sunday?

23 A. For a couple of hours.

24 Q. And were you in uniform at that  
25 time?

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1 TALIA BUMB

2 A. Yes.

3 Q. And did you bring -- did you say  
4 black boots you were told to bring?

5 A. Yes.

6 Q. Did you have -- own a pair of black  
7 boots?

8 A. No.

9 Q. You had to purchase them?

10 A. Yes.

11 Q. And have you worn those black boots  
12 since you purchased them?

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13 A. Yes.  
14 Q. How frequently have you worn them?  
15 A. Maybe a couple times a week.  
16 Q. Since you purchased them in July?  
17 A. Since it got cold out.  
18 Q. Did you purchase them in June or  
19 July of 2007?  
20 A. Yes.  
21 Q. How much were they, the black  
22 boots?  
23 A. They were \$80.  
24 Q. Where did you purchase them?  
25 A. DSW.

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1 TALIA BUMB  
2 Q. And did you have to purchase  
3 anything else in connection with your Scores  
4 employment?  
5 A. Like hosiery.  
6 Q. Did you not own any hosiery at the  
7 time you applied for the job?  
8 A. I'm not sure. Not that I recall.  
9 Q. So what did you purchase in the way  
10 of hosiery?  
11 A. Like black -- black stockings.  
12 Q. Black stockings.  
13 A. Uh-huh.  
14 Q. How many pair did you purchase?  
15 A. Throughout my employment there,  
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13 A. Yes.  
14 Q. The same way that a customer did?  
15 A. Yes.  
16 Q. Now, did you receive any tips when  
17 you were working for Go West?  
18 A. Yes.  
19 Q. And in what form were tips  
20 received?  
21 A. Cash.  
22 Q. All were in cash?  
23 A. Some were credit card tips as well.  
24 Q. Did you ever receive any diamond  
25 dollars?

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1 TALIA BUMB  
2 A. Yes.  
3 Q. How many?  
4 A. Twenty.  
5 Q. You received \$20 in diamond  
6 dollars?  
7 A. Yes.  
8 Q. How did you receive it?  
9 A. From a customer.  
10 Q. Now, when you were doing your  
11 end-of-night accounting for tips, was that  
12 accounted for at that time?  
13 A. I tried to turn it in.  
14 Q. Let me ask you. You testified,  
15 before, that at the end of the night you

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16 counted your tips.  
17 A. Uh-huh.  
18 Q. And the \$20 -- \$20 diamond dollars  
19 that you received, was that part of the tips  
20 that you counted at the end of the night?  
21 A. Yes.  
22 Q. It was?  
23 A. Yes.  
24 Q. And you handed in diamond dollars  
25 at that time?

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1 TALIA BUMB  
2 A. Yes.  
3 Q. And did you account for it  
4 separately than the cash tips?  
5 A. I'm not sure how the manager wrote  
6 it -- well, he didn't write it down because he  
7 said it was expired, so he didn't account for  
8 it.  
9 Q. So it was the manager who told --  
10 the manager who was overseeing the counting  
11 process that told you it was expired?  
12 A. Yes.  
13 Q. And who was that manager?  
14 A. I believe it was Alberto.  
15 Q. So did you ever attempt to exchange  
16 any diamond dollars?  
17 A. That one with Alberto. He told me  
18 it was expired, so I couldn't.



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19 Q. So what did you do with it?  
20 A. I don't recall at this time.  
21 Q. Do you still have it?  
22 A. No.  
23 Q. You don't recall what you did with  
24 it, though?  
25 A. No.

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1 TALIA BUMB  
2 Q. Did anyone else ever attempt to  
3 give you any diamond dollars?  
4 A. No.  
5 Q. Just that one customer on that one  
6 occasion?  
7 A. Yes.  
8 Q. Did you review your paycheck when  
9 you received it?  
10 A. Not thoroughly.  
11 Q. Did you look at it in the way that  
12 we just looked at it now?  
13 A. No.  
14 Q. Did there appear to be any  
15 inaccuracies in the paycheck when you reviewed  
16 it?  
17 A. I didn't really check it for  
18 inaccuracies.  
19 Q. Well, what did you check it for?  
20 A. To see how much it was, and then I  
21 cashed it.

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20 Q. well, how weren't you fairly  
21 compensated?  
22 A. As before, I don't think I received  
23 compensation for the time that I was -- the  
24 correct amount of compensation for the time I  
25 was there in my tips and things.

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1 TALIA BUMB  
2 Q. So you've talked about your feeling  
3 that you didn't receive all your credit card  
4 tips.  
5 A. Yes.  
6 Q. Is there any other aspect in which  
7 you feel you weren't fairly compensated?  
8 A. well, the diamond dollars incident.  
9 Q. The \$20 diamond dollars that you  
10 didn't get reimbursed for because it was  
11 expired?  
12 A. Yes.  
13 Q. But you don't know what you did  
14 with those \$20 diamond dollars.  
15 A. No. I didn't get the money for it.  
16 Q. But the bill itself. You don't  
17 know what happened to the bill itself?  
18 A. No.  
19 Q. Now, did you look at the bill after  
20 you were told that it had expired? Did you see  
21 an expiration date on it?  
22 A. Yes.

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23 Q. And is it true that the expiration  
24 date was in the past at the time you received  
25 it?

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1 TALIA BUMB

2 A. Yes.

3 Q. Is there any other way in which you  
4 feel you were not fairly compensated?

5 A. I had to buy stuff for the uniform.

6 Q. The boots?

7 A. Yes.

8 Q. And the hosiery?

9 A. Yes.

10 Q. Did you buy anything else?

11 A. Those are the main items I  
12 remember.

13 Q. Do you know if there was anything  
14 else?

15 A. Those are the only things I can  
16 recall at this time.

17 Q. Have you spoken to any current or  
18 former employees of Go west since you left?

19 A. No.

20 Q. Do you know anything about how the  
21 East Side club is run?

22 A. No.

23 Q. Did you know there was an East Side  
24 club?

25 A. Yes.